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Our File No. 71689a ELH

THOMAS HAMILL; GREGORY LASKY

Plaintiffs,

V.

NORTH WILDWOOD CITY; JOHN DOE(S)  
FICTITIOUS NAMES OF DEFENDANTS A  
THRU Z

Defendants.

UNITED STATE DISTRICT COURT  
DISTRICT OF NEW JERSEY: CAMDEN

CIVIL ACTION NO.: 1:10-CV-06587-JBS-  
KMW

**AFFIDAVIT OF ERIC L. HARRISON**

I, Eric L. Harrison, of full age, duly certify as follows:

1. I am an attorney at law in the State of New Jersey, associated with the law firm of Methfessel & Werbel, attorneys for the defendant, City of North Wildwood, and in such capacity I am fully familiar with the facts of the within matter.

2. The attachments annexed to this defendant's Motion for Summary Judgment are true, accurate, and authentic.

3. **Exhibit A** is a copy of plaintiff Thomas Hamill's Complaint against the City of North Wildwood.

4. **Exhibit B** is a copy of the relevant portions of plaintiff Hamill's October 5, 2011 deposition.

5. **Exhibit C** is a copy of a list of all known lawsuits filed by Thomas Hamill as of April 5, 2010.

6. **Exhibit D** is a copy of a signed Stipulation dismissing organizational plaintiff Advocates for Disabled Americans, filed October 24, 2011.

7. **Exhibit E** is a copy of the Court's February 14, 2011 Order dismissing plaintiffs' claims under the New Jersey Law Against Discrimination without prejudice and dismissing plaintiff Loose from the action without prejudice.

8. **Exhibit F** is a copy of the Complaint in Edward Law v. City of North Wildwood, CIV-09-CV-04178.

9. **Exhibit G** is a copy of the relevant portions of plaintiff Edward Law's July 16, 2010 deposition in Edward Law v. City of North Wildwood, CIV-09-CV-04178.

10. **Exhibit H** is a copy of plaintiffs' correspondence amending their F. R. Civ. 26 Disclosures to name Gregory Lasky and Albena Shutenko as fact witnesses in Edward Law v. City of North Wildwood, CIV-09-CV-04178.

11. **Exhibit I** is a copy of the relevant portions of plaintiff, Gregory Lasky's, December 3, 2010 deposition transcript in Edward Law v. City of North Wildwood, CIV-09-CV-04178.

12. **Exhibit J** is a copy of the relevant portions of plaintiff Lasky's October 7, 2011 deposition.

13. **Exhibit K** is a copy of the settlement agreement in Edward Law v. City of North Wildwood, CIV-09-CV-04178.

14. **Exhibit L** is a copy of the relevant portions of plaintiff Hamill's May 7, 2012 deposition.

15. **Exhibit M** is a copy of Plaintiff's February 15, 2012 Amended Complaint.

16. **Exhibit N** is a copy of correspondences (and their attachments) between counsel regarding the provision of accommodations for AFDA members on July 16, 2011.

17. **Exhibit O** is a copy of AFDA's response to Defendant's interrogatories and production of document request.

18. **Exhibit P** is a copy of the relevant portions of fact witness Albena Shutenko's October 7, 2011 deposition.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment by law.

**METHFESSEL & WERBEL, ESQS.**  
Attorneys for North Wildwood City



By: \_\_\_\_\_  
Eric L. Harrison

DATED: July 16, 2012